

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

PATRICIA S. ABBOTT,

Plaintiff,

v.

Case No. 3:12CV202

WAFFLE HOUSE, INC.,  
EAST COAST WAFFLES, INC.,  
AND  
R.C.G.T, INC.

Defendants.

**Plaintiff's Motion To Compel Discovery And Overrule  
Defendant Waffle House Inc.'s Claim Of Work Product Privilege**

Comes now the plaintiff, by counsel, and moves the Court to overrule Waffle House, Inc.'s claim of work product privilege as to statements and documents created before suit was filed and to compel discovery for the reasons set forth in the accompanying brief. A good faith effort has been made between counsel to resolve the discovery matters at issue without success.

PATRICIA S. ABBOTT,

by \_\_\_\_\_/s/\_\_\_\_\_

Counsel

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 25th day of May 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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